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Counsel for Defendant, DOUGLAS STORMS YORK

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. 15-00226 BLF
)	
Plaintiff,)	DEFENDANT DOUGLAS STORMS
)	YORK'S PROPOSED VERDICT FORM
v.)	
)	Pretrial Conference: July 16, 2015
)	Time: 2:00 p.m.
DOUGLAS STORMS YORK,)	
)	Trial Date: July 20, 2015
Defendant.)	
)	Honorable Beth Labson Freeman

Defendant Douglas Storms York submits the proposed verdict form attached as Exhibit A.

Dated: July 9, 2015

Respectfully submitted,

STEVEN G. KALAR
Federal Public Defender

/s/ Graham Archer

GRAHAM ARCHER
Assistant Federal Public Defender

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 15-00226 BLF
)	
Plaintiff,)	VERDICT
)	
v.)	
)	
DOUGLAS STORMS YORK,)	
)	
Defendant.)	
_____)	

1) Did the government prove beyond a reasonable doubt that Mr. York falsely pretended to be an employee acting under the authority of the United States Internal Revenue Service?

_____ NO

_____ YES (proceed to question two)

2) Did the government prove beyond a reasonable doubt that Mr. York acted in such a manner as an employee of the United States Internal Revenue Service?

_____ NO

_____ YES (proceed to question three)

1 3) Did the government prove beyond a reasonable doubt that Mr. York acted with the intent
2 to defraud?

3 _____ NO

4 _____ YES
5

6
7
8 If you answered “No” to questions one, two or three, you must find Mr. York Not Guilty of
9 the offense as charged.

10
11
12 Therefore, we the jury in the above-captioned case, unanimously find the Defendant, Douglas
13 Storms York:

14
15 _____, (*Not Guilty or Guilty*) of False Impersonation of a Federal
16 Employee, in violation of 18 U.S.C. § 912.

17
18 Dated: _____, 2015

19 _____
JURY FOREPERSON
20
21
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23
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